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Attorneys for Plaintiff,
IBUUMERANG

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

IBUUMERANG, LLC. a Texas Limited
Liability Company

Plaintiff,

vs.

T1 PAYMENTS LLC, a Nevada limited
liability company; T1 PAYMENTS
LIMITED, a United Kingdom private limited
company; TGLOBAL SERVICES LIMITED,
a United Kingdom private limited company;
DONALD KASDON, an individual; DEBRA
KAREN KING aka DEBRA KAREN
KASDON, an individual; AMBER
FAIRCHILD, an individual; PAYVISION
B.V., a Netherlands limited company;
Pixxles, Ltd., a United Kingdom private
limited company

Defendants.

Case No. 2:21-cv-01611-JCM-VCF

Judge: Hon. James C. Mahan
Magistrate Judge: Cam Ferenbach

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTIONS TO DISMISS**

For good cause shown below, and pursuant to Fed. R. Civ. P. 16(b)(4) and Local Rules IA 6-1,
L.R. 26-3, Plaintiff, Ibuumerang, LLC, and Defendants Amber Fairchild, Debra King, and Donald

1 Kasdon jointly request that the Court extend the deadlines to respond to Defendants' Motions to
2 Dismiss (Dkt. 41, 42, and 43), and the deadlines for defendants to file their replies to plaintiff's
3 forthcoming oppositions, as follows:

- 4
- 5 A. On February 11, 2022, defendant Amber Fairchild filed a motion to dismiss the First
6 Amended Complaint (DKT 41) pursuant to Rule 12(b)6.
- 7 B. Also, on February 11, 2022, defendant Debra Karen King filed a motion to dismiss the First
8 Amended Complaint (DKT 42) pursuant to Rule 12(b)6.
- 9 C. Also, on February 11, 2022, defendant Donald Kasdon filed a motion to dismiss the First
10 Amended Complaint (DKT 43) pursuant to Rule 12(b)6.
- 11
- 12 D. Responses to all three motions are presently due on February 25, 2022.
- 13 E. In addition to responding to the three motions, plaintiff's counsel is presently responding to
14 a Rule 56 motion in the case entitled *Federal Trade Commission v. QYK Brands LLC et. al.*
15 pending in the United States District Court for the Central District of California (Case. No.
16 8:20-cv-01431-PSG-KES). This motion contains in excess of 4,000 pages.
- 17
- 18 F. No previous extensions have been requested to respond to the three motions to dismiss.
- 19 G. A short, two-week, extension to file the responses to the three motions to dismiss in this
20 case will not prejudice the defendants.
- 21 H. Defendants Fairchild, King and Kasdon do not oppose plaintiff's request for an extension
22 but request that they be given a two-week extension to file their replies because their new
23 reply date, March 18, would conflict with other matters including depositions in an
24 unrelated case.
- 25

26 It is hereby stipulated between plaintiff Ibuumerang, LLC, and defendants Amber Fairchild,
27 Debra Karen King, and Donald Kasdon, through their attorneys of record, that Ibuumerang, LLC,
28 shall have a two week extension (until March 11, 2022) to file its responses to the three motions to

1 dismiss filed by the defendants and that defendants Fairchild, King and Kasdon shall have until
2 April 1, 2022, to file their replies to plaintiff's forthcoming oppositions.

3
4 DATED: February 22, 2022

WELLMAN & WARREN

5
6 By: /s/ Scott Wellman
7 Scott Wellman, Esq.
8 Defendant/Counterclaimant,
Ibuumerang, Inc.

9 DATED: February 22, 2022

SLIGHTING LAW

10
11 By: /s/ Bradley S. Slighting
12 Bradley S. Slighting, Esq.
13 Defendant/Counterclaimant,
Ibuumerang, Inc.

14
15 DATED: February 22, 2022

VENABLE LLP

16
17 By: /s/ Ari N. Rothman
18 Ari Rothman, Esq.
19 Attorney for Donald Kasdon,
Amber Fairchild, Debra King

CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, under the laws of the United States of America that on this date, I caused to be electronically filed the foregoing document, and this Certificate of ECF Filing & Service, with the Clerk of the Court using the CM/ECF system, who will send notification of such filing to the following party:

Attorneys for Defendants

ARI N. ROTHMAN, VENABLE LLP; anrothman@venable.com

KORY L. KAPLAN, KAPLAN COTTNER; kory@kaplancottner.com

Attorneys for T1 Payments LLC

RICHARD EDWARD HASKIN, GIIBS GIDEN LOCHER TURNER SENET & WITTBRODT

Nathan D. O'Malley, Peter J. Diedrich, Giorgio A. Sassine, MUSICK, PEELER & GARRETT LLP

Attorneys for PayVision B.V., a Netherlands Limited Company.

DATED this 22nd day of February 2022, at Laguna Hills, California.

/s/ Kelsey Schafer

Paralegal

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 IBUUMERANG, LLC, a Texas Limited
5 Liability Company

6 Plaintiff,

7 vs.

8 T1 PAYMENTS LLC, a Nevada limited
9 liability company; T1 PAYMENTS
10 LIMITED, a United Kingdom private limited
11 company; TGLOBAL SERVICES LIMITED,
12 a United Kingdom private limited company;
13 DONALD KASDON, an individual; DEBRA
14 KAREN KING aka DEBRA KAREN
15 KASDON, an individual; AMBER
16 FAIRCHILD, an individual; PAYVISION
17 B.V., a Netherlands limited company;
18 Pixxles, Ltd., a United Kingdom private
19 limited company

20 Defendants.

Case No. 2:21-cv-01611-JCM-VCF

Judge: Hon. James C. Mahan

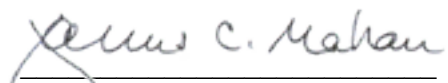
Magistrate Judge: Cam Ferenbach

**ORDER REGARDING
STIPULATION TO EXTEND TIME TO
RESPOND TO MOTIONS TO DISMISS**

21 Good cause having been shown, the above Stipulation is GRANTED. Plaintiff, Ibuumerang,
22 LLC shall have until March 11, 2022 to respond to the motions to dismiss (DKT Nos. 41, 42 & 43)
23 filed by Amber Fairchild, Debra Karen King and Donald Kasdon, and defendants Fairchild, King
24 and Kasdon shall have until April 1, 2022, to file their replies.

25 **IT IS SO ORDERED.**

26 DATED: February 23, 2022


UNITED STATES DISTRICT JUDGE